

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CARLOS RAMIREZ, on behalf of  
himself and all others similarly situated,

Plaintiff,  
v.

THE PARADIES SHOPS, LLC,  
a Georgia limited liability company,

Defendant.

Case No.: 1:21-cv-03758-ELR

**JOINT MOTION TO RE-OPEN CASE**

Plaintiff, Carlos Ramirez, on behalf of himself and all others similarly situated, and Defendant, The Paradies Shops, LLC, a Georgia limited liability company (“Defendant”) by and through undersigned counsel, hereby files this Motion to Re-Open the above-styled case. In support, the parties states as follows:

1. The parties held mediation on November 20, 2023.
2. No resolution was reached.

**WHEREFORE**, the parties respectfully request that the Court re-open Case No. 1:21-cv-03758-ELR and grant such other and further relief as the Court deems just and proper.

Respectfully submitted, this 1<sup>st</sup> day of December, 2023.

**MORGAN & MORGAN PLLC**

/s/ Dylan A. Bess

Dylan A. Bess  
P.O. Box 57007  
Atlanta, GA 30343-1007  
E-Mail: [dbess@forthepeople.com](mailto:dbess@forthepeople.com)

**MORGAN & MORGAN  
COMPLEX BUSINESS  
DIVISION**

/s/ John A. Yanchunis

John A. Yanchunis (*Admitted Pro Hac Vice*)  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
E-Mail: [jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)

**MAXEY LAW FIRM, P.A.**

Ryan D. Maxey (*Admitted Pro Hac Vice*)  
107 N. 11th St. #402  
Tampa, FL 33602  
E-Mail: [ryan@maxeyfirm.com](mailto:ryan@maxeyfirm.com)

*Attorneys for Plaintiff*

**HOLLAND & KNIGHT LLP**

/s/ Peter N. Hall

Peter N. Hall  
Georgia Bar No. 141376  
1180 West Peachtree Street, NW,  
Suite 1800  
Atlanta, GA 30309  
Telephone: (404) 817-8412  
Facsimile: (404) 881-0470  
E-Mail: [peter.hall@hklaw.com](mailto:peter.hall@hklaw.com)

Paul Bond, *Admitted Pro Hac Vice*  
Cira Centre, Suite 800

2929 Arch Street  
Philadelphia, PA 19104  
Telephone: (215) 252-9600  
Facsimile: (215) 867-6070  
E-Mail: [paul.bond@hklaw.com](mailto:paul.bond@hklaw.com)

*Attorneys for Defendant The Paradies Shops,  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I served a true and correct copy of the within and foregoing ***Defendant The Paradies Shops, LLC's Motion to Re-Open Case*** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following Counsel of Record:

Dylan A. Bess, Esq.  
Morgan & Morgan PLLC, Atlanta  
P.O. Box 57007  
Atlanta, GA 30343-1007  
[dbess@forthepeople.com](mailto:dbess@forthepeople.com)

John A. Yanchunis, Esq.  
Morgan & Morgan Complex Business Division  
201 N. Franklin Street  
7th Floor  
Tampa, Florida 33602  
[jyanchunis@ForThePeople.com](mailto:jyanchunis@ForThePeople.com)

Ryan D. Maxey  
Maxey Law Firm, P.A.  
107 N. 11th St. #402  
Tampa, FL 33602  
[ryan@maxeyfirm.com](mailto:ryan@maxeyfirm.com)

This 1<sup>st</sup> day of December, 2023.

/s/ Peter N. Hall  
Peter N. Hall  
Georgia Bar No. 141376